

**THE BUENKER LAW FIRM  
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July 13, 2021

Via ECF  
Honorable Charles Eskridge  
United States District Judge  
515 Rusk Street  
Houston, Texas 77002

Re: C.A. No. 4:21-cv-0938; *Rosa Maria Garcia v. Southwestern Building Services, Inc.*; In the United States Federal District Court, Southern District of Texas, Houston Division.

Judge Eskridge:

As you requested at the scheduling conference, here is the proposed discovery and briefing schedule agreed to by the parties for the Plaintiff's motion to send notice to similarly situated workers:

- July 28, 2021 Defendant will provide requested information regarding other workers;
- September 10, 2021 No later than this date, the Plaintiff will file her motion;
- No later than 21 days after Plaintiff files her motion, Defendant will respond;
- No later than 7 days after Defendant's response, Plaintiff may reply.

Please let us know if this proposal does not meet with the Court's approval.

Sincerely,

**THE BUENKER LAW FIRM**

*JOSEF F. BUENKER*

Josef F. Buenker

JFB/mtf